

EXHIBIT D-1

Page 1. United States District Court for the District of Puerto Rico

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[seal] Sabana Hoyos Correctional Institute
Commonwealth of Puerto Rico
CORRECTIONS DEPARTMENT
AND REHABILITATION
PUERTO RICO
216
Criminal Record

Mr. Pedro Ruiz Villega
Petitioner
vs
United States District [Court]
For the District of Puerto Rico
Respondent

Case No. 17 – 2823 – LTS

For: Proof of Claim on Lawsuit under Title III
PROMESA [Puerto Rico Oversight, Management,
and Economic Stability Act]
PROMESA PROOF OF CLAIM # 9778
on Motion on Petition and Request for information

[Barcode]
990123401013767

Motion on Petition and Request for Information from the United States District [Court] for the
District of Puerto Rico

To the Honorable Court:

Date Stamped Copy Returned
 No Self-Addressed Stamped Envelope
 No Copy Provided
FR

The petitioner most respectfully appears before this Honorable Court. He states that on
July 6, 2021, the attorney in charge of the case sent a document attached to this motion which
reads as follows:

1) That the petitioner most respectfully submits to this Honorable Court that the legal
representative in the case is not my current counsel and I hereby inform this Honorable Court
that as of the receipt of this Motion on Petition and Request for Information we expect that all
notices or orders

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are to be sent directly to the petitioner mentioned above,

Mr. Pedro Ruiz Villegas
Institución Correccional 216 2-H
Edif – 2
HC – 01 Box 71671
Sabana Hoyos PR 00688

[seal] Sabana Hoyos Correctional
Institute
Commonwealth of Puerto Rico
CORRECTIONS DEPARTMENT
AND REHABILITATION
PUERTO RICO
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Criminal Record

2) That the petitioner most respectfully submits the following to this Honorable Court. He states that the document that Sonia S. Sierra Sepulveda, Esq. delivered to me via mail specifies that an attached document related to the Proof of Claim filed by this Petitioner before the Bankruptcy Court in the PROMESA case arrived and this document also specifies that the Commonwealth is seeking to disallow the claim sent by this servant by arguing that the petitioner omitted to provide *prima facie* evidence to support an insured claim. And according to Sonia S. Sierra, Esq., she has not intervened in the case and therefore it is requested that this Honorable Court might provide a legal representation that can pursue the appropriate legal procedures, due to the fact that the petitioner is unable to afford the cost of private legal representation due to the financial conditions he is facing. He lacks assets and wealth to cover the costs of adequate legal representation. He therefore petitions this Honorable Court to request the corresponding legal representation on the grounds of indigence.

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and thus be able to proceed with the corresponding Statutes of the case [sic.].

3) That the petitioner most respectfully submits the following to this Honorable Court. He states that the documents that have been sent by this Honorable Court have been delivered to the petitioner with delay due to the fact that they have been sent directly to the former legal representative Sonia S. Sierra Sepulveda, Esq., and all the documents that this Honorable Court sent to the petitioner arrived at her offices and then Atty. Sonia would send me those documents, and then when the Corrections Department delivered them to me there was not enough time to comply with the Statute of Limitations and therefore I am informing this Honorable Court to make it aware of the reason for any delay and [requesting] respectfully reconsider my case, allowing me to carry on with the proceedings of this case.

4) That the petitioner most respectfully comes before this Honorable Court and states that Sonia S. Sierra, Esq. specifies in the letter that I received on July 6, 2021, in which there is an argument that the petitioner failed to provide *prima facie* evidence to support an insured claim.

Respectfully, the petitioner did comply with these requirements of evidence, which were as follows:

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(1) Proof of claim so as to be actually received on or before the applicable bar date: General Bar Day: May 29, 2018, at 4:00 pm, and this was sent on March [illegible], 2018

(2) Court of Appeals, in re Administrative Review, Case # PA-9413-44 Codified P-16, regarding collection of payrolls – 8/31/2016 which was when the Administrative Remedy was submitted.

(3) The Petitioner sent the Inmate Transaction Report for 6/07/2013 through 1/17/2014 in which (7) payrolls are reflected, which are the following:

- 1) Payroll: June 2013 - \$49.16
- 2) Payroll: July 2013 - \$16.00
- 3) Payroll:
- 4) Payroll: August 2013 - \$16.80
- 5) Payroll: Special, May 2013 - \$95.00
- 6) Payroll: Carpentry, November 2013 - \$46.50
- 7) Payroll: September 2013 - \$100.00

(4). The Petitioner filed an Administrative Remedy on July 16, 2014 in which he specified the claim for payment as a construction worker and I was informed that I had been paid as a maintenance worker, for which they have to pay me the remainder of what had been stipulated as a worker and the deputy in charge, but the head of my work station informed me that the problem had been worked out and that it is a matter of waiting. I have been waiting for more than six (6) years for this process.

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5) The petitioner asserts, most respectfully before this Honorable Court, that the conditions at the federal level are such that the motions that have been filed have to be certified in the English language.

Most respectfully before this Honorable Court, the petitioner makes it known that he does not know how to certify the motion in the English language, and he requests that this Honorable Court assign a person who can represent the petitioner and who can translate the documents that have been filed by the petitioner due to the fact that the petitioner lacks the assets and wealth that would cover the costs of the fees generated by this motion, on the grounds of indigence.

6) The petitioner most respectfully informs this Honorable Court that on July 16, 2014, the petitioner filed the Administrative Remedies and everything related to this Claim of Payment case for work performed by the inmate petitioner, and furthermore the exact address is being sent where this Honorable Court can send Notices or Order Rulings that this Honorable Court may issue.

7) The petitioner most respectfully requests that this Honorable Court assess this case in detail and that consideration be given so that the proceedings might continue and the petitioner be excused for the delays that have arisen previously,

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About which I gave information, and we hope that no further inconveniences will arise. It is also requested that this Honorable Court be made aware that the Commonwealth is making a claim under the Bankruptcy Law (PROMESA). When the CORRECTIONS DEPARTMENTs is asked to carry out construction work and they use inmates for that work and the money is allocated in advance whereby if a private company completes the work, they are awarded the corresponding payments. Why is it that if a prisoner does the work, they do not pay him and say that there is no money available? When that money has already been allocated and they use as an excuse that the Fiscal Control Board does not want to send the money, and the Treasury is limited in paying. Therefore, we hope that an investigation will be carried out into the work that was done and who granted the permits, who must respectfully comply with the corresponding payments, or what did they do with the allocated money.

For the reasons mentioned above, we ask that this Honorable Court resolve this matter and consequently issue an order granting [this motion] and granting the corresponding payments.

I certify that what is set forth in this motion is true, accurate and correct, and [request] that a copy of this Honorable Court's ruling be sent to the appropriate parties.

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Relief Sought

The petitioner most respectfully requests that this Honorable Court grant a hearing for the parties to appear, if necessary, and that Legal Representation can be granted to the petitioner on the grounds of indigence, and that what is admissible by law be granted, according to the laws of the Commonwealth of Puerto Rico.

Most respectfully submitted:

This 29th day of July, 2021, in Sabana Hoyos P.R. 00688

[seal] Sabana Hoyos Correctional Institute
Commonwealth of Puerto Rico
CORRECTIONS DEPARTMENT
AND REHABILITATION
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Respectfully:
* Pedro Ruiz Villegas
Inmate

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO / TRIBUNAL DE DISTRITO DE LOS ESTADOS UNIDOS PARA EL
DISTRITO DE PUERTO RICO

Fill in this information to identify the case (Select only one Debtor per claim form). / Llene esta información para identificar el caso (seleccione sólo un deudor por formulario de reclamación).		
<input checked="" type="checkbox"/> Commonwealth of Puerto Rico El Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA) La Corporación del Fondo de Interés Apremiante de Puerto Rico	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority La Autoridad de Carreteras y Transportación de Puerto Rico	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico El Sistema de Retiro de los Empleados del Gobierno del Estado Libre Asociado de Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority La Autoridad de Energía Eléctrica de Puerto Rico	Case No. 17-bk-04780	Petition Date: July 2, 2017

MMLID: 503343

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Modified Official Form 410 / Formulario Oficial 410 Modificado

Proof of Claim / Evidencia de reclamación

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Lea las instrucciones antes de completar este formulario. Este formulario está diseñado para realizar una reclamación de pago en un caso en virtud del Título III. No utilice este formulario para solicitar el pago de un gasto administrativo que no sea una reclamación que reúna los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b) (9) del U.S.C. Ese tipo de solicitud debe realizarse de conformidad con el Título 11 § 503 del U.S.C.

Quienes presenten la documentación deben omitir o editar información que reúna los requisitos para ser tratada con privacidad o confidencialidad en este formulario o en cualquier otro documento adjunto. Adjunte copias editadas de cualquier otro documento que respalde la reclamación, tales como pagarés, órdenes de compra, facturas, balances detallados de cuentas en funcionamiento, contratos, resoluciones judiciales, hipotecas y acuerdos de garantías. No adjunte documentos originales, ya que es posible que los documentos adjuntos se destruyan luego de analizarlos. En caso de que los documentos no estén disponibles, explique los motivos en un anexo.

Fill in all the information about the claim as of the Petition Date.

Complete toda la información acerca de la reclamación a la fecha en la que se presentó el caso.

Part 1 / Parte 1	Identify the Claim / Identificar la reclamación
1. Who is the current creditor? ¿Quién es el acreedor actual?	RUIZ VILLEGAS, PEDRO Name of the current creditor (the person or entity to be paid for this claim) Nombre al acreedor actual (la persona o la entidad a la que se le pagará la reclamación) Other names the creditor used with the debtor Otros nombres que el acreedor usó con el deudor

2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. From whom? Si. ¿De quién? _____
3. Where should notices and payments to the creditor be sent?	Where should notices to the creditor be sent? ¿A dónde deberían enviarse las notificaciones al acreedor?
Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) ¿A dónde deberían enviarse las notificaciones al acreedor?	RUIZ VILLEGAS, PEDRO LCDA. SONIA SIERRA SEPULVEDA PO BOX 331031 PONCE, PR 00733-1031 721 R. Ruiz Villegas Name / Nombre 50 CAVV # unit 501-2A Number / Número Street / Calle Industrial Lechería Bayamon PR City / Ciudad State / Estado ZIP Code / Código postal 00961-2403 Contact phone / Teléfono de contacto
Norma federal del procedimiento de quiebra (FRBP, por sus siglas en inglés) 2002(g)	Where should payments to the creditor be sent? ¿A dónde deberían enviarse los pagos al acreedor? (En caso de que sea diferente)
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) Sí. Número de reclamación en el registro de reclamaciones judiciales (en caso de saberlo) _____ Filed on / Presentada el _____ (MM/DD/YYYY) / (DD/MM/AAAA)
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Who made the earlier filing? Sí. ¿Quién hizo la reclamación anterior? _____
¿Sabe si alguien más presentó una evidencia de reclamación para esta reclamación?	Contact email / Correo electrónico de contacto Contact email / Correo electrónico de contacto

Part 2 / Parte 2:

Give Information About the Claim as of the Petition Date

Complete toda la información acerca de la reclamación desde la fecha en la que se presentó el caso.

6. Do you have a claim against a specific agency or department of the Commonwealth of Puerto Rico?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Identify the agency or department and contact name. (A list of Commonwealth of Puerto Rico agencies and departments is available at: https://cases.primeclerk.com/puertorico/) Sí. Identifique el organismo o departamento y nombre del representante. (Una lista de agencias y departamentos del Estado Libre Asociado de Puerto Rico está disponible en: https://cases.primeclerk.com/puertorico/). Correctional Institution of P.R. _____
7. Do you supply goods and / or services to the government?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Provide the additional information set forth below / Si. Proporcionar la información adicional establecida a continuación: Vendor / Contract Number Número de proveedor / contrato: _____ Correctional Institution List any amounts due after the Petition Date (listed above) but before June 30, 2017: Anote la cantidad que se le debe después de la fecha que se presentó el caso (mentionados anteriormente), pero antes del 30 de junio de 2017 \$ <u>3 00 . 00</u>

8. How much is the claim? ¿Cuál es el importe de la reclamación?	\$ <u>300.00</u>	Does this amount include interest or other charges? ¿Este importe incluye intereses u otros cargos? <input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). Sí. Adjunte un balance con intereses detallados, honorarios, gastos u otros cargos exigidos por la Norma de Quiebras 3001(c)(2)(A).
9. What is the basis of the claim? ¿Cuál es el fundamento de la reclamación?	<p>Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.</p> <p>Por ejemplo: Venta de bienes, préstamo de dinero, arrendamiento, prestación de servicios, lesiones personales u homicidio culposo, o tarjetas de crédito. Adjunte copias editadas de cualquier documento que respalte la reclamación conforme a lo exigido por la Norma de Quiebras 3001(c). Limite la divulgación de información que reúne los requisitos para ser tratada con privacidad, tal como información sobre atención médica.</p>	
<u>performing services</u>		
10. Is all or part of the claim secured? ¿La reclamación está garantizada de manera total o parcial?	<input type="checkbox"/> No / No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Sí. La reclamación está garantizada por un derecho de retención sobre un bien. <p>Nature of property / Naturaleza del bien:</p> <input type="checkbox"/> Motor vehicle / Vehículos <input type="checkbox"/> Other. Describe: _____ Payroll payments <p>Basis for perfection / Fundamento de la realización de pasos adicionales: _____</p> <p>Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)</p> <p>Adjunte copias editadas de documentos, si los hubiere, que demuestre la realización de pasos adicionales para hacer valer un derecho de garantía (por ejemplo, una hipoteca, un derecho de retención, un certificado de propiedad, una declaración de financiamiento u otro documento que demuestre que se ha presentado o registrado un derecho de retención).</p> <p>Value of property / Valor del bien: \$ _____</p> <p>Amount of the claim that is secured / Importe de la reclamación que está garantizado: \$ <u>300.00</u></p> <p>Amount of the claim that is unsecured / Importe de la reclamación que no está garantizado: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) (La suma del importe garantizado y no garantizado debe coincidir con el importe de la línea 7.)</p> <p>Amount necessary to cure any default as of the Petition Date / Importe necesario para compensar toda cesación de pago a la fecha que se presentó el caso : \$ _____</p> <p>Annual Interest Rate (on the Petition Date) Tasa de interés anual (cuando se presentó el caso) % <input type="checkbox"/> Fixed / Fija <input type="checkbox"/> Variable / Variable</p>	
11. Is this claim based on a lease? ¿Esta reclamación está basada en un arrendamiento?	<input checked="" type="checkbox"/> No / No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the Petition Date. Sí. Importe necesario para compensar toda cesación de pago a partir de la que se presentó el caso \$ _____	

12. Is this claim subject to a right of setoff?

No / No

Yes. Identify the property /
Sí. Identifique el bien:

Payroll payments for a special job

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

¿La reclamación, total o parcial, cumple los requisitos para ser tratada como prioridad administrativa conforme al Título 11 § 503(b)(9) del U.S.C.?

No / No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the Petition Date in these Title III case(s), in which the goods have been sold to the debtor in the ordinary course of such debtor's business. Attach documentation supporting such claim.

Sí. Indique el importe de la reclamación que surge del valor de cualquier bien recibido por el deudor dentro de los 20 días anteriores a la fecha de inicio en estos casos del Título III, en el que los bienes se han vendido al deudor en el transcurso normal de los negocios del deudor. Adjunte la documentación que respalda dicha reclamación.

Part 3 / Parte 3:

Sign Below / Firmar a continuación

The person completing this proof of claim must sign and date it.
FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

La persona que completa esta evidencia de reclamación debe firmar e indicar la fecha.
FRBP 9011(b).

Si presenta esta reclamación de manera electrónica, la FRBP 5005(a)(2) autoriza al tribunal a establecer normas locales para especificar qué se considera una firma.

Check the appropriate box / Marque la casilla correspondiente:

- I am the creditor. / Soy el acreedor.
 I am the creditor's attorney or authorized agent. / Soy el abogado o agente autorizado del acreedor.
 I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004. / Soy el síndico, el deudor o su agente autorizado. Norma de quiebra 3004.
 I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005. / Soy el garante, fiador, endosante u otro codeudor. Norma de quiebra 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

Comprendo que una firma autorizada en esta *Evidencia de reclamación* se considera como un reconocimiento de que al calcular el importe de la reclamación, el acreedor le proporcionó al deudor crédito para todo pago recibido para saldar la deuda.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

He leído la información en esta *Evidencia de reclamación* y tengo motivos razonables para suponer que la información es verdadera y correcta.

I declare under penalty of perjury that the foregoing is true and correct. / Declaro bajo pena de perjurio que lo que antecede es verdadero y correcto.

Executed on date / Ejecutado el _____ (MM/DD/YYYY) / (DD/MM/AAAA)

Signature / Firma Pedro Roberto Ruiz Villegas

Print the name of the person who is completing and signing this claim / Escriba en letra de imprenta el nombre de la persona que completa y firma esta reclamación:

Name

Pedro Roberto Ruiz Villegas
First name / Primer nombre Middle name / Segundo nombre Last name / Apellido

Title / Cargo

Inmate
Correctional Institute of P.R.

Company / Compañía

Identify the corporate servicer as the company if the authorized agent is a servicer.
Identifique al recaudador corporativo como la compañía si el agente autorizado es un recaudador.

Address / Dirección

50 Carr. 57 unit 501

Number / Número

Street / Calle

Industrial Techetto

City / Ciudad Bayamon PR 00961-7403 State / Estado ZIP Code / Código postal

Contact phone / Teléfono de contacto _____

Email / Correo electrónico _____

***CUST PR 1845 SRF 54642 PackID: 240 MMLID: 503343-P Svc: 345
RUIZ VILLEGRAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE PR 00733-1031

JUN 28 2021

100-02

BDN Puerto Rico 1845 SRF 22380 SVC: MML PACK ID: 33716 MML ID: 503343

F2R4-0033721
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE, PR 00733-1031

PLEASE SEND COMPLETED PROOF(S) OF CLAIM SO AS TO BE ACTUALLY RECEIVED ON OR BEFORE THE APPLICABLE BAR DATE:

General Bar Date: May 29, 2018 at 4:00 p.m., Atlantic Standard Time

Please send completed Proof(s) of Claim to:

If by first class mail:
Commonwealth of Puerto Rico
Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4708
New York, NY 10163-4708

If by overnight courier or hand delivery/Para enviar por mensajería o entrega al siguiente dia:

Refer to "Section 6 -- Where and How to File" in the enclosed notice for additional locations in the Commonwealth accepting hand delivery of completed proof of claim forms.

Consulte la "Sección 6: Para ver dónde y cómo presentar su formulario" del aviso adjunto. Habran varias ubicaciones en el Commonwealth donde se aceptara la entrega de estos formularios de prueba de reclamo completados.

If you have questions about this notice, please call (844) 822-9231 (US toll free), (646) 486-7944 (international), email PuertoRicoInfo@primeclerk.com, or visit <https://cases.primeclerk.com/puertorico>

Si tiene preguntas acerca de este aviso, llame al (844) 822-9231 (local), (646) 486-7944 (internacional), envíe un correo electrónico a PuertoRicoInfo@PrimeClerk.com, o visite <https://cases.primeclerk.com/puertorico>

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

También puede enviar su reclamo electrónicamente visitando <http://cases.primeclerk.com/puertorico/EPOC-Index>

**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING
TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Reason:	The claimant failed to provide prima facie evidence to support a secured claim.			

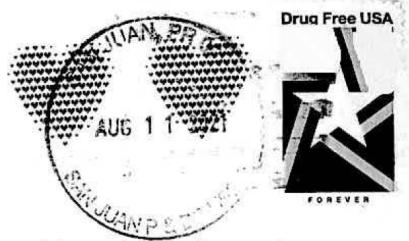
**SI SU RECLAMO ESTÁ INCLUIDO AQUÍ, UNO O MÁS DE LOS DEUDORES SOLICITAN
QUE SU RECLAMO SEA RECHAZADO POR LA RAZÓN INDICADA AQUÍ ABAJO.**

NOMBRE	N.º DE RECLAMACIÓN	FECHA DE PRESENTACIÓN	DEUDOR	MONTO DE LA RECLAMACIÓN ALEGADA
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Base para:	El demandante omitió proporcionar pruebas evidentes para apoyar un reclamo asegurado.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copias de la Objeción global, y todos los escritos radicados en el marco de las causas conforme al Título III, están disponibles, de manera gratuita, en <https://cases.primeclerk.com/puertorico>. Si tiene alguna pregunta, comuníquese con Prime Clerk LLC llamando al (844) 822-9231 (número gratuito para Estados Unidos y Puerto Rico) o (646) 486-7944 (para llamadas desde el extranjero), disponible entre las 10:00 a.m. y las 07:00 p.m. (AST) (hablamos español).

from: Pedro Ruiz Villegas 2-H40
Int. Corr. 216 S-H.
HC-01 Box 71671
Sabana Hoyo, PR. 00688



RECEIVED
AUG 20 2021
PRIME CLERK LLC

1016384208 8068

To: Commonwealth of Puerto Rico
Claims Processing Center
c/o: Prime Clerk LLC
Grand Central Station, P.O. Box 4708
New York, NY 10163-0008

(1)

United States District Court

for the District of Puerto Rico

[stamp:] RECEIVED
AUG 20 2021
PRIME CLERK LLC

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

Mr. Pedro Ruiz Villegas
Petitioner

Case No. 17-3823-LTS

vs.

For: Proof of Claim on Lawsuit under Title III,
PROMESA [Puerto Rico Oversight, Management,
and Economic Stability Act]
PROMESA Proof of Claim # 9778
on Motion on Petition and Request for
Information

United States District [Court]
For the District of Puerto Rico
Respondent

[barcode:]
170328380104701

Motion on Petition and Requests for Information from the United States District [Court]
for the District of Puerto Rico

To the Honorable Court

Date Stamped Copy Returned
 No Self-Addressed Stamped Envelope
 No Copy Provided

The Petitioner now most respectfully appears before this Honorable Court. He states that on July 6, 2021, the attorney who was in charge of the case sent a document which is attached to this motion. This motion reads as follows:

1) The Petitioner most respectfully informs this Honorable Court that the legal representative of the case is not my current attorney, and I hereby inform this Honorable Court that as of the receipt of this Motion on Petition and Request for Information we expect all notifications or orders

(2)

to be sent directly to the Petitioner identified in the caption,

Mr. Pedro Ruiz Villegas

Institución Correccional 216 S.H.

Edif. - 2

HC-01 Box 71671

Sabana Hoyos, PR 00688

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

*2) The Petitioner most respectfully states to this Honorable Court that the document Attorney Sonia S. Sierra Sepúlveda sent me by mail specifies that an attached document arrived related to the Proof of Claim filed by this Petitioner with the Bankruptcy Court in the PROMESA case, and said document also specifies that the Commonwealth is seeking to disallow the claim I sent, by arguing the Petitioner failed to provide *prima facie* evidence to support a secured claim. According to what Attorney Sonia S. Sierra stated, she has not intervened in the case. It is therefore requested that this Honorable Court provide a legal representation that will be able to pursue the appropriate legal procedures, due to the fact that the Petitioner cannot afford the cost of Private Legal Representation, on account of the economic conditions he is facing. He has no assets or wealth to defray the expenses occasioned by an adequate legal representation. He therefore petitions that this Honorable Court, based on Indigency, request a legal representation*

(3)

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

and thus be able to proceed with the applicable Statutes [sic].

3) The Petitioner most respectfully appears before this Honorable Court and states that the documents that have been sent by the Honorable Court have been received by the Petitioner with a delay in time, because they have been sent directly to the legal representative, Attorney Sonia S. Sierra Sepúlveda, and all the documents this Honorable Court was sending to the Petitioner arrived at her offices. And after that Attorney Sonia would send those documents to me. And when the Department of Correction would give them to me, I did not have sufficient time to comply with the Statutes of Limitation. For that reason, I am making it known to this Honorable Court and so that you may be aware of any delay, and that you respectfully reconsider me, and allow me to pursue the procedures in this case.

*4) The Petitioner most respectfully states to this Honorable Court that Attorney Sonia S. Sierra makes a statement in the letter I received on July 6, 2021, where there is an argument that the Petitioner failed to provide *prima facie* evidence to support a secured claim.*

Respectfully, the Petitioner met those evidentiary requirements:

Which were as follows:

(4)

[seal:]
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Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

(1) *Proof of Claim so as to be Actually Received on or Before the
Aplicable [sic] Bar Date: General Bar Day: May 29, 2018 at 4:00 p.m.
It was sent on March 2, 2018.*

(2) *Court of Appeals, regarding Administrative Review, Case # PA-9413-94, Codified P-16,
regarding collection of Payroll – 8/31/16, which is when the Administrative Remedy was
submitted.*

(3) *The Petitioner sent the Report of Transactions of the Inmate as of 6/07/2013 and up until
1/17/2014, which reflects (7) payroll periods, which are as follows:*

- 1) *Payroll: June 2013 – \$49.16*
- 2) *Payroll: July 2013 – \$16.00*
- 3) *Payroll:*
- 4) *Payroll: August 2013 – \$16.80*
- 5) *Payroll: Special, May 2013 – \$95.00*
- 6) *Payroll: Carpentry, November 2013 – \$46.50*
- 7) *Payroll: September 2013 – \$100.00*

(4) *The Petitioner submitted an Administrative Remedy on July 16, 2014, which specified a claim
for payment as a construction worker, and I was informed that I was paid as a maintenance
worker, on which they have to pay me the rest of what is stipulated as a worker, and the
Lieutenant in charge plus the boss for my work are telling me that they had fixed the problem,
and that it's a matter of waiting, and I've been waiting for more than (6) years of the process.*

(5)

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
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PUERTO RICO
216
Criminal Record

5) *The Petitioner most respectfully alleges to this Honorable Court that the conditions at the Federal level of motions that have been submitted have to be certified in the English language.*

The Petitioner most respectfully makes known to you that he does not have the knowledge to be able to certify the Motion in the English language, and he asks this Honorable Court to assign a person to him to represent the Petitioner and be able to translate the documents submitted by the Petitioner, given that the Petitioner lacks the assets and wealth to be able to defray the costs of the professional fees generated by this Motion, due to Indigency.

6) *The Petitioner most respectfully informs this Honorable Court that on July 16, 2014, the Petitioner submitted the Administrative Remedies and everything related to this case of a Claim for Payment of Work performed by the inmate Petitioner. I am also sending the exact address where this Honorable Court can send the Notifications or Order Decisions issued by this Honorable Court.*

7) *The Petitioner most respectfully requests of this Honorable Court that this case be evaluated in detail, and that in consideration thereof, the procedures go forward, and that the Petitioner may be excused for the lateness that has occurred before,*

(6)

[seal:]
Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
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Criminal Record

of which I informed you, and we hope that more problems do not occur. It is also requested that this Honorable Court become aware that the Commonwealth is making a claim under the law (PROMESA) on bankruptcy. When the Department of Correction is asked that they have to do construction work and they use inmates for that work, and the money is allocated in advance, on which, if a private company finishes the work, they give them the corresponding payments. Why, if an inmate is the one that does the work, don't they pay him? And they say that there is no money available, when that money has already been allocated, and they use, as an excuse, that the Fiscal Control Board does not want to send the money and the Treasury limits itself in paying. For all these reasons we hope that an investigation will be made on the work that was done and who granted these permits and respectfully has to make the corresponding payments, or what did they do with the allocated money?

For all of the foregoing reasons, we ask this Honorable Court, with what is stated above, to decide this matter, and, as a consequence, issue an order "finding merit," and granting the corresponding payments.

I certify that what is set forth in this motion is true, accurate, and correct, and [ask] that a copy of the decision taken by this Honorable Court be sent to the pertinent parties.

(7)

Prayer for Relief

The Petitioner most respectfully prays to this Honorable Court that it grant a hearing for the Parties to appear, if necessary, and to be able to grant the Petitioner a Legal Representation on the Grounds of Indigency, and to grant what is legally appropriate under the laws of the Commonwealth of Puerto Rico.

Most respectfully submitted.

This 29th day of July of 2021

in Sabana Hoyos PR 00688

[seal:]

Sabana Hoyos Correctional Institution
Commonwealth of Puerto Rico
DEPARTMENT OF CORRECTION
AND REHABILITATION
PUERTO RICO
216
Criminal Record

Respectfully,

* Pedro Ruiz Villegas

Inmate

You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

Fill in this information to Identify the case (Select only one Debtor per claim form).		
<input checked="" type="checkbox"/> Commonwealth of Puerto Rico	Case No. 17-bk-03283	Petition Date: May 3, 2017
<input type="checkbox"/> Puerto Rico Sales Tax Financing Corporation (COFINA)	Case No. 17-bk-03284	Petition Date: May 5, 2017
<input type="checkbox"/> Puerto Rico Highways and Transportation Authority	Case No. 17-bk-03567	Petition Date: May 21, 2017
<input type="checkbox"/> Employees Retirement System of the Government of the Commonwealth of Puerto Rico	Case No. 17-bk-03566	Petition Date: May 21, 2017
<input type="checkbox"/> Puerto Rico Electric Power Authority	Case No. 17-bk-04780	Petition Date: July 2, 2017

MMLID: 503343

[stamp:] RECEIVED
AUG 20 2021
PRIME CLERK

721

Modified Official Form 410

Proof of Claim

04/16

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

Read the instructions before filling out this form. This form is for making a claim for payment in a Title III case. Do not use this form to make a request for payment of an administrative expense, other than a claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9). Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy or subject to confidentiality on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after being analyzed. If the documents are not available, explain in an attachment.

Fill in all the information about the claim as of the Petition Date.

Fill in all the information about the claim as of the Petition Date.

Part 1	Identify the Claim
1. Who is the current creditor?	RUIZ VILLEGAS, PEDRO Name of the current creditor (the person or entity to be paid for this claim) 721
	Other names the creditor used with the debtor

2. Has this claim been acquired from someone else?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent?		Where should notices to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g) RUIZ VILLEGAS, PEDRO LCD.A. SONIA SIERRA SEPULVEDA PO BOX 331031 Where should notices and payments to the creditor be sent? PONCE, PR 00733-1031	Where should payments to the creditor be sent? (if different) 721 Pedro Ruiz Villegas Name 50 Carr # Unit 501-I-A Number Street Industrial Luchetti Bayamon PR 00961-7403 City State ZIP Code
4. Does this claim amend one already filed?		<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) _____ Filed on _____ (MM/DD/YYYY)	
5. Do you know if anyone else has filed a proof of claim for this claim?			<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____
Part 2 Give Information About the Claim as of the Petition Date Fill in all information about the claim as of the petition date.			
6. Do you have a claim against a specific agency or department of the Commonwealth of Puerto Rico? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Identify the agency or department and contact name (A list of Commonwealth of Puerto Rico agencies and departments is available at: https://cases.primaclerk.com/puertorico/) Yes. Identify the agency or department and name of the representative. (A list of Commonwealth of Puerto Rico agencies and departments is available at: https://cases.primeclerk.com/puertorico/). <i>Correctional Institution of Puerto Rico</i>			
7. Do you supply goods and / or services to the government? <input type="checkbox"/> No <input type="checkbox"/> Yes. Provide the additional information set forth below Vendor / Contract Number: <i>Correctional Institution</i> List any amounts due after the Petition Date (listed above) but before June 30, 2017: <i>\$ 300.00</i>			

Modified Official Form 410

Proof of Claim

page 2

8. How much is the claim? \$ <u>300.00</u>	Does this amount include interest or other charges? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A). Yes. Attach a statement with itemized interest, as well as professional fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).
9. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.	<u>Provision of services</u>
10. Is all or part of the claim secured? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Motor vehicle / Vehicles <input type="checkbox"/> Other. Describe: <u>payment of payroll</u>	Basis for perfection _____ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ _____ Amount of the claim that is secured \$ <u>300.00</u> Amount of the claim that is unsecured \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.) Amount necessary to cure any default as of the Petition Date \$ _____ Annual Interest Rate (on the Petition Date) ____% <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
11. Is this claim based on a lease? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the Petition Date \$ _____	

<p>12. Is this claim subject to a right of setoff? <input type="checkbox"/> No <input checked="" type="checkbox"/> Yes, Identify the property <u>Payment of payroll for special work.</u></p>	
<p>13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods \$ _____ received by the debtor within 20 days before the Petition Date in these Title III case(s), in which the goods have been sold to the debtor in the ordinary course of such debtor's business. Attach documentation supporting such claim.</p>	
Part 3	Sign below
<p>The person completing this proof of claim must sign and date it. FRBP 9011(b). If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.</p> <p>The person completing this proof of claim must sign and date it. FRBP 9011(b). If you file this claim electronically, FRBP 5005(a)(2) authorizes the court to establish local rules specifying what is deemed to constitute a signature.</p>	<p><i>Check the appropriate box</i></p> <p><input checked="" type="checkbox"/> I am the creditor. <input type="checkbox"/> I am the creditor's attorney or authorized agent. <input type="checkbox"/> I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004. <input type="checkbox"/> I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.</p> <p>I understand that an authorized signature on this <i>Proof of Claim</i> serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>I have examined the information in this <i>Proof of Claim</i> and have a reasonable belief that the information is true and correct.</p> <p>I have read the information in this <i>Proof of Claim</i> and I have reasonable grounds to assume that the information is true and correct.</p> <p>I declare under penalty of perjury that the foregoing is true and correct.</p> <p>Executed on date / Executed on _____ (MM/DD/YYYY)</p> <p>Signature <u>[signature]</u></p> <p>Print the name of the person who is completing and signing this claim:</p> <p>Name <u>Pedro</u> First name <u>Roberto</u> Middle name <u>Ruiz Villegas</u> Last name</p> <p>Title <u>inmate</u></p> <p>Company <u>Correctional Institution, Puerto Rico</u> Identify the corporate servicer as the company if the authorized agent is a servicer.</p> <p>Address <u>50 Carr # Unit 501-1-A</u> Number <u>Street</u> <u>Industrial Luchetti</u> City <u>Bayamon</u> State <u>PR 00961-7403</u> ZIP Code</p> <p>Contact phone _____ Email _____</p>

***CUST PR 1845 SRF 54642 PackID: 240 MMLID: 503343-P Svc: 345
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE PR 00733-1031

JUN 28 2021

MAR 02

BDN Puerto Rico 1845 SRF 22380 SVC: MML PACK ID: 33716 MML ID: 503343

F2R4-0033721
RUIZ VILLEGAS, PEDRO
LCDA. SONIA SIERRA SEPULVEDA
PO BOX 331031
PONCE, PR 00733-1031

PLEASE SEND COMPLETED PROOF(S) OF CLAIM SO AS TO BE ACTUALLY RECEIVED ON OR BEFORE THE APPLICABLE BAR DATE:

General Bar Date: May 29, 2018 at 4:00 p.m., Atlantic Standard Time

Please send completed Proof(s) of Claim to:

If by first class mail:
Commonwealth of Puerto Rico
Claims Processing Center
c/o Prime Clerk LLC
Grand Central Station, PO Box 4708
New York, NY 10163-4708

If by overnight courier or hand delivery:

Refer to "Section 6 -- Where and How to File" in the enclosed notice for additional locations in the Commonwealth accepting hand delivery of completed proof of claim forms.

Refer to "Section 6: To See Where and How to File your Form." There will be several locations in the Commonwealth where the delivery of these proof of claim form will be accepted.

If you have questions about this notice, please call (844) 822-9231 (US toll free), (646) 486-7944 (international), email PuertoRicoInfo@primeclerk.com, or visit <https://cases.primeclerk.com/puertorico>

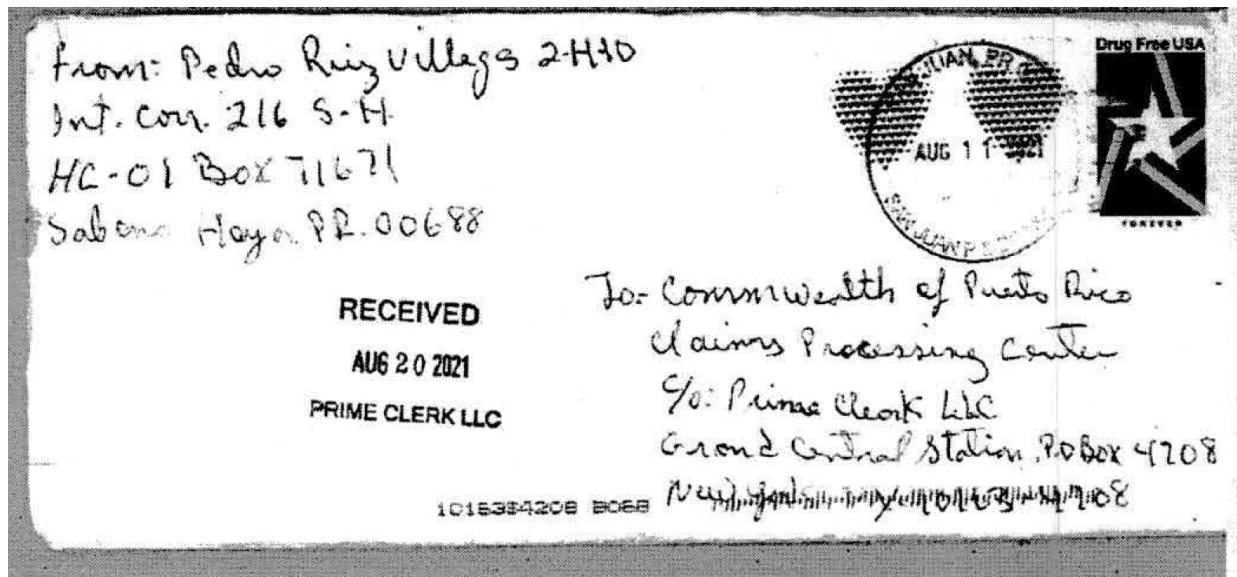
You may also submit your claim electronically by visiting <http://cases.primeclerk.com/puertorico/EPOC-Index>

**IF YOUR CLAIM IS LISTED HERE, ONE OR MORE OF THE DEBTORS ARE SEEKING
TO DISALLOW YOUR CLAIM FOR THE REASON LISTED BELOW.**

NAME	CLAIM #	DATE FILED	DEBTOR	ASSERTED CLAIM AMOUNT
RUIZ VILLEGAS, PEDRO	9778	5/1/2018	Commonwealth of Puerto Rico	\$300.00
Reason:	The claimant failed to provide <i>prima facie</i> evidence to support a secured claim.			

Copies of the Omnibus Objection and all other filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have questions, please contact Prime Clerk LLC at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available).

Copies of the Omnibus Objection and all filings in the Title III Cases are available free online at <https://cases.primeclerk.com/puertorico>. If you have a question, contact Prime Clerk LLC by calling (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for overseas callers), available 10:00 a.m. to 7:00 p.m. (AST) (we speak Spanish).





T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 9778**

Signed this 15th day of December, 2021



Verify at www.atanet.org/verify

A handwritten signature in blue ink, appearing to read "Andreea I. Boscor". A blue line points from the "Signed this 15th day of December, 2021" text towards the signature.

Andreea I. Boscor

